

# Paul V. Sundberg

## Project Consultant

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October 15, 2014

James Dotchin  
Nevada Division of Environmental Protection  
Bureau of Corrective Actions  
2030 E. Flamingo Road, Suite 230  
Las Vegas, NV 89119

**Re: Quarterly Progress Report - Third Quarter 2014  
Environmental Conditions Investigation Program  
Former Montrose Facility - Henderson, Nevada**

Dear Mr. Dotchin,

On behalf of Montrose Chemical Corporation of California (Montrose), please find summarized below a list of work performed or significant activities completed for the environmental program at the former Montrose facility in Henderson, Nevada during the Third Quarter of 2014. This Quarterly Progress Report has been prepared in accordance with the Montrose Phase II Consent Decree Agreement, dated June 18, 1996.

- On July 24, 2014, Montrose and the Stauffer site Companies submitted to NDEP a request for an revised Remedial Alternative Study (RAS) submittal schedule. NDEP approved the request on July 24, 2014.
- On August 5, 2014, Montrose and the Stauffer site Companies submitted to NDEP a response to NDEP's June 16, 2014 comments on the Draft Groundwater RAS.
- On August 15, 2014, Montrose submitted for NDEP's review an NFA request for the DCB Warehouse area including a Data Usability Evaluation (DUE) and Project Summary.
- On September 4, 2014, Montrose and the Stauffer site Companies submitted to NDEP, a letter outlining recommendations for a process to administratively close the Companies' previous tasks for investigation of the UMCf and Wastewater Ponds 1&2. NDEP accepted the recommendations on September 12, 2014.
- On September 4, 2014, Montrose and the Stauffer site Companies submitted to NDEP two follow-up reports relevant to previous technical discussions regarding the shallow groundwater flow pathway along the eastern side of the OSSM site and chemical distribution downgradient of the OSSM and NERT groundwater treatment systems. Included were reports on particle tracking of groundwater

flow along the eastern side of the OSSM site (dated August 21, 2014) and the sampling results of the a Boulder Highway monitoring well transect (dated August 22, 2014).

- On September 4, 2014, Montrose submitted to NDEP for review a DNAPL Mobility Test Workplan for a test well sited on NERT property. On September 12, NDEP approved the workplan for implementation.

As of the end of the 3<sup>rd</sup> quarter, Montrose and its consultants were working on the following programs or documents:

- Field mobilization for implementation of the DNAPL migration study at well MW-18 on NERT property.
- A Data Usability Evaluation (DUE) document for the Closed Pond Area (CPA) and Former Tank Farm (FTF) as a follow-up to NDEP's approval of the CSM for submittal planned for November 2014.
- A Data Usability Evaluation (DUE) document for the Former Plant Site (FPS) to accompany a CSM for submittal planned for November 2014.
- A CSM revision and a response to NDEP comments on the previous submitted Screening Risk Assessment for the Former Benzene Storage Tank Area (FBST) intended for submittal to NDEP in December 2014.
- A package of information requested by NDEP to process a NFA for the Former Underground Benzene Storage Tank Area (FUBST), intended for submittal to NDEP in December 2014.

Although not directly part of the Phase II ECI program, during the 3<sup>rd</sup> quarter of 2014, Montrose continued its participation in the operation and management of the site-wide groundwater treatment system (GWTS). Among the 3<sup>rd</sup> quarter GWTS operations were the submittal of the Semi-Annual Injection Control Report (dated August 11, 2014) and the Quarterly Operations Report (dated August 14, 2014). Finally, Montrose remains in ongoing discussions with NDEP and the Stauffer site Companies regarding investigation responsibilities for the Common Area Ditches.

Should you have any comments on this progress report, do not hesitate to call me.

Submitted by,



Paul V. Sundberg  
Consultant to Montrose

Cc:

Joseph Kelly - Montrose - Bainbridge Island - via e-mail  
Kelly Richardson - Latham & Watkins - San Diego - via e-mail  
BMI Interested Parties via document distribution website